

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS-EASTERN DIVISION**

PC, LLC,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE “A”,

Defendants.

No. 23-cv-3501

**PLAINTIFF’S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Plaintiff PC, LLC, (“Plaintiff”) requests leave to file the following attached documents under seal: (1) Plaintiff’s Complaint; (2) Schedule “A” attached to the Complaint, which lists the Defendant Internet Stores; (3) Exhibit 1 to the Complaint, Plaintiff’s federal trademark, design patent and copyright registrations; (4) Plaintiff’s Motion and Brief in Support of Plaintiff’s *Ex Parte* Request for an Emergency Temporary Restraining Order (“TRO”), which includes alleged facts of the Complaint and Plaintiff’s reasoning for seeking such an order, (5) the Declaration in support of the motion for TRO, and (6) Exhibits 1 and 2 to the Declaration containing Plaintiff’s trademark, design patent, and copyright registration certificates and evidence referenced in the Declaration. In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement and counterfeiting, false designation of origin, copyright infringement, design patent infringement, and violation of the Illinois Uniform Deceptive Trade Practices Act, and civil conspiracy.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant

documentary evidence and the concealment or transfer of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated: June 2, 2023

Respectfully submitted,

/s/James E. Judge

Zareefa B. Flener (IL Bar No. 6281397)

James E. Judge (IL Bar No. 6243206)

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